

**SHEILA LINDERMAN**

Organic Certification Consultant · Organic Products Specialist

August 14, 2005

Mr. Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA – AMS – TSO – NOP  
1400 Independence Avenue SW, Room 4008  
Washington, DC 20050

RE: Docket Number TM – 04 – 07

Dear Mr. Neal, and the National Organic Standards Board:

On behalf of several of my clients and in the interest of promoting as much organic agriculture as possible, I would like to see **Yeast** in all its forms dropped from section **205.605(a)** of the National List. Here is my reasoning:

- When yeast was proposed for inclusion on the NL in 2000, its commercial production was such that the NOSB deemed it non-agricultural, and therefore not certifiable as organic. I actually salute the NOSB for this, as commercial yeast is produced using harsh chemicals, such as caustic lye and sulfuric acid; the wastewater from commercial yeast production contains these and other chemicals, and is clearly not environmentally friendly. However, since 2000, methods for yeast production have been devised whereby chemical substrates and inputs are eliminated; this yeast is grown entirely on agricultural products. That they NOSB did not predict this could happen is completely understandable. However, I believe that this fact should now be recognized.
- Because these “new” yeasts are grown on agricultural substrates—namely, grains—they depend on the land. If yeast is dropped from the 205.605(a) and allowed to become certified as organic, that land on which the grains are grown will have to be certified as well. If our goal is to dedicate as much land as possible to organic agriculture, allowing yeast to become certified brings us that much closer to that goal.
- Organic yeast is available in Europe. This fact alone should be reason enough to drop it from the NL. Clearly the German Company, Agrano, has found a way to produce yeast so that it falls within the parameters of organic production.

I believe that this is an extremely important issue, and one that should be looked at from several angles, including the agricultural-versus-non-agricultural one. I thank you for your consideration

Respectfully,



Sheila Linderman

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RE: Docket Number TM – 04 – 07

Dear Mr. Neal and the National Organic Standards Board:

On behalf of several of my clients, who are certified under the NOP as processors, I would like to comment on retention of the following items, currently found in Section **205.605(b)** of the National List.

Material	Reason(s) for retention on the National List
Ammonium Bicarbonate	Leavening agent, used extensively in the baking industry
Calcium Phosphates (mono-, di-, and tribasic)	Flow agent, particularly useful with hygroscopic powders
Carbon Dioxide	Environmentally friendly and non-toxic solvent for the supercritical fluid extraction of polar raw materials, such as ginger and black pepper.
Cellulose	Casings, filtering aid, flow agent
Glycerin	Useful in the production of allowed flavors and extracts
Magnesium Stearate	Excipient in MWOI products
Nutrient Vitamins and Minerals	Improved nutritional values in foods
Ozone	Natural fumigant, which works by lysing certain bugs, their eggs, and/or their larvae, and then is released into the atmosphere as oxygen gas. Specific to certain organisms that do not respond to other gaseous fumigants
Potassium Hydroxide	Alkaline processing aid, useful in the extraction of non-polar botanicals, such as annatto
Silicon Dioxide	Anti-caking agent
Sodium Hydroxide	Alkaline processing aid, useful in the extraction of non-polar botanicals, such as annatto
Tocopherols	Antioxidant, important in the control of rancidity in products containing fats

Whereas some organic materials exist that can replace the above-mentioned synthetics in some cases, none exists that can replace each synthetic in all cases. It is our hope, of course, that the day will come when all of these synthetics can be replaced by organic materials, but until that time, we ask the NOSB to retain these synthetics on the National List.

Respectfully submitted,

A handwritten signature in black ink, reading "Sheila Linderman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sheila Linderman

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RE: Docket Number TM – 04 – 07

Dear Mr. Neal, and the National Organic Standards Board:

On behalf of several of my clients, who are certified as handler/processors, I would like to comment on the retention of the following materials under Section **205.605(a)** of the National List.

Material	Reason(s) for retention on National List
Acids – citric and lactic	Flavor enhancement and/or pH adjustment
Colors, non-synthetic	Color enhancement and consistency control
Dairy cultures	Addition of living organisms to certain formulations
Diatomaceous Earth	Filtering medium
Plant Enzymes	Addition to probiotic nutrients
Kaolin	Spray-drying medium
Nitrogen	Freezing aid for cryo-grinding
Oxygen	Production of ozone
Sodium Bicarbonate	Baking applications and/or pH adjustment

My clients are dedicated to the growth and longevity of the organic industry. They can be counted upon to replace the above with organic materials, as those materials become available and can be proven to perform as needed. Until those organic materials can be developed, however, we ask that the above materials remain on the National List.

Respectfully submitted,



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RE: Docket Number TM – 04 – 07

Dear Mr. Neal and the National Organic Standards Board:

In the interest of advancing the organic industry toward its goal of dedicating as much land as possible to organic agriculture, I urge you to consider dropping two items – **cornstarch and gums** – from Section 205.606 of the National List.

Cornstarch has been available in many forms as certified organic for quite sometime. Its continued inclusion on the National List misleads product developers into thinking that they can use conventional material, even though organic is available.

The same can be said for certain gums, including Arabic, locust bean and carob bean.

Thank you for your consideration.

Respectfully submitted,



Sheila Linderman